

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

SHERMAN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

APR - 8 2009

DAVID J. MALAND, CLERK
BY
DEPUTY

UNITED STATES OF AMERICA	§	FILED UNDER SEAL
	§	
VS.	§	CASE NO. 4:09-CR-57
	§	Judge Crone
(1) RUBEN OLIVARES-GONZALEZ,	§	
a.k.a. Tezano,	§	
(2) CARLOS ESPINOZA-LAGUNAS,	§	
a.k.a. Pelon,	§	
(3) ALEJANDRO RODRIGUEZ-FLORES,	§	INDICTMENT
a.k.a. Cheque,	§	
a.k.a. Ezequiel Trujillo,	§	
(4) EUSTAQUIO CAMPUZANO-CANDIDO,	§	
a.k.a. Cacho	§	
a.k.a. Eustaquio Campuzano-Figueroa,	§	
(5) SILVANO TRUJILLO-GOMEZ,	§	
a.k.a. Tito,	§	
a.k.a. Xavier Escobar-Perez,	§	
a.k.a. Roberto Espinoza-Arizmendi,	§	
(6) MISAEL RAMIREZ,	§	
a.k.a. Gato,	§	
(7) VALENTINA CAMPUZANO-AVILES,	§	
a.k.a. Dalia Bautista,	§	
a.k.a. Valenta,	§	
(8) TOMASA GARCIA-RAMIREZ,	§	
(9) SERGIO CRUZ-FLORES,	§	
a.k.a. Yeyo,	§	
(10) MARIA SUSANA BLANCAS-PATINO,	§	
(11) JULIAN ORTIZ-FLORES,	§	
(12) LEONEL CARACHURE-LOPEZ,	§	
a.k.a. Don,	§	
(13) ARTURO MONTES-FLORES,	§	
a.k.a. Don Arturo,	§	
(14) ALFONSO ECHEVERRIA-AGUIRRE,	§	
a.k.a. Don Poncho,	§	
(15) ISRAEL MIRANDA-SEVILLA,	§	
a.k.a. Pirras,	§	
(16) JOSE ABDENCIO TORRES-TORRES,	§	
(17) LOURDES BENITEZ-BAHENA,	§	
a.k.a. Lulu,	§	
(18) GERARDO HERNANDEZ-MEJIA,	§	

a.k.a. Carlitos, §
 (19) JORGE ALBERTO CUBAS, §
 (20) MARCO VERDE-ASIAIN, §
 (21) BRAULIO PEREZ-DOMINGUEZ, §
 (22) FELIPE GARNICA-GARCIA, §
 (23) JOSE GOMEZ-HERRERA, §
 a.k.a. Nestor Arizmendi-Escobar, §
 (24) VICTOR MANUEL RAMIREZ-SANCHEZ, §
 a.k.a. Don Victor, §
 (25) OSCAR ARIZMENDI-ESCOBAR, §
 (26) CELIO TORRES-LINARES, §
 (27) IRINEO ARIZMENDI-ARIZMENDI, §
 (28) VICTOR JUAN ESQUIVEL-GOMEZ, §
 a.k.a. Christian Herrera-Zuares, §
 (29) VICTOR SALAMANCA-CERVANTES, §
 (30) LUIS SOTELO-DOMINGUEZ, §
 (31) PEDRO DOMINGUEZ-AGUIRRE, §
 (32) ISMAEL SEDANO-ESCOBAR, §
 (33) BENITO CARRENO-SOTELO, §
 (34) SANTIAGO TORRES-ACOSTA, §
 (35) MARTHA SALAZAR-GARZA, §
 a.k.a. Pati, §
 (36) LUIS ESCOBAR-ARIZMENDI, §
 (37) LAZARO AYALA-TELLEZ, §
 (38) DAXO MORALES-ROSALES, §
 (39) ELEUTERIO OTLICA-BALDERRABANO, §
 (40) OSIRIS MONTOYA-GUADARRAMA, §
 (41) GILBERTO ORTIZ-TRUJILLO, §
 a.k.a. Gil, §
 a.k.a. La Maranna, §
 a.k.a. Daniel Trujillo-Morales, §
 (42) MISAEL GOMEZ-TRUJILLO, §
 (43) MANUEL ARTURO CASTILLO, §
 (44) RAFAEL ARIZMENDI-MONTERO, §
 a.k.a. Jorge Landa-Lopez, §
 a.k.a. Antonio Arizmendi-Flores, §
 (45) EZEQUIEL CAMPUZANO-AVILES, §
 a.k.a. Cheque, §
 (46) MARIO GARDUNO-CASTANEDA, §
 a.k.a. Pulpa, §
 a.k.a. Kanik Rodriguez-Gomez, §
 a.k.a. Mario Godono-Casterton, §
 (47) REYMUNDO MENDOZA-TREJO, §
 a.k.a. Manuel Ramirez-Trejo, §
 (48) GALDINO TOMAS-DIONICIO, §
 (49) JOSE AVILES-ESTRADA, §

a.k.a. Arturo Contreras-Lopez, §
a.k.a. Jose Luis Estrada, §
(50) JOSE LUIS PEDROZA-GUTIERREZ, §
(51) JOSE JUAN PEDROZA-POPOCA, §
(52) DOMINGO ROJAS-VILLA, §
a.k.a. Mingo, §
(53) GUADALUPE GARDUNO-MONDRAGON, §
a.k.a. Tito, §
(54) RAMON RODRIGUEZ, §
(55) "ERIC" LAST NAME UNKNOWN, §
(56) JUAN OLMOS, §
(57) OSCAR ORTIZ, §
a.k.a. Guatafay, §
a.k.a. Guero, §
(58) AURELIO GARDUNO-MARTINEZ, §
(59) VICTOR MOLINA-OBANDO, §
a.k.a. Victor Molina-Vuילו, §
(60) JOSE GONZALEZ-VEGA, §
(61) ROGELIO MELCHOR-BLAS, §
(62) MARCELO PEREZ-DOMINGUEZ, §
(63) PEDRO DOROTEO-SOSTENES, §
a.k.a. Pedro Doroteo-Sustanance, §
(64) AGUSTIN GONZALEZ-SOLANO, §
(65) EZEQUIEL ROCCO-MONDRAGON, §
a.k.a. Gato, §
(66) DAVID GARCIA-SOTELO, §
a.k.a. Pedro Lopez-Hernandez, §
Defendants §

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT ONE

Violation: 8 U.S.C. § 1324(a)(1)(A)(v)(I)
(Conspiracy to Transport and Harbor Illegal
Aliens)

Beginning in or about 2006, the exact date unknown, and continuously thereafter up to and including the date of the filing of this Indictment, in Hopkins County, Texas, in the Eastern District of Texas, and elsewhere, the above named Defendants, **RUBEN OLIVARES-**

GONZALEZ, a.k.a. Tejano, **CARLOS ESPINOZA-LAGUNAS**, a.k.a. Pelon, **ALEJANDRO RODRIGUEZ-FLORES**, a.k.a. Cheque, a.k.a. Ezequiel Trujillo, **EUSTAQUIO CAMPUZANO-CANDIDO**, a.k.a. Cacho, a.k.a. Eustaquio Campuzano-Figueroa, **SILVANO TRUJILLO-GOMEZ**, a.k.a. Tito, a.k.a. Xavier Escobar-Perez, a.k.a. Roberto Espinoza-Arizmendi, **MISAEEL RAMIREZ**, a.k.a. Gato, **VALENTINA CAMPUZANO-AVILES**, a.k.a. Dalia Bautista, a.k.a. Valenta, **TOMASA GARCIA-RAMIREZ**, **SERGIO CRUZ-FLORES**, a.k.a. Yeyo, **MARIA SUSANA BLANCAS-PATINO**, **JULIAN ORTIZ-FLORES**, **LEONEL CARACHURE-LOPEZ**, a.k.a. Don, **ARTURO MONTES-FLORES**, a.k.a. Don Arturo, **ALFONSO ECHEVERRIA-AGUIRRE**, a.k.a. Don Poncho, **ISRAEL MIRANDA-SEVILLA**, a.k.a. Pirras, **JOSE ABDENCIO TORRES-TORRES**, **LOURDES BENITEZ-BAHENA**, a.k.a. Lulu, **GERARDO HERNANDEZ-MEJIA**, a.k.a. Carlitos, **JORGE ALBERTO CUBAS**, **MARCO VERDE-ASIAIN**, **BRAULIO PEREZ-DOMINGUEZ**, **FELIPE GARNICA-GARCIA**, **JOSE GOMEZ-HERRERA**, a.k.a. Nestor Arizmendi-Escobar, **VICTOR MANUEL RAMIREZ-SANCHEZ**, a.k.a. Don Victor, **OSCAR ARIZMENDI-ESCOBAR**, **CELIO TORRES-LINARES**, **IRINEO ARIZMENDI-ARIZMENDI**, **VICTOR JUAN ESQUIVEL-GOMEZ**, a.k.a. Christian Herrera-Zuares, **VICTOR SALAMANCA-CERVANTES**, **LUIS SOTELO-DOMINGUEZ**, **PEDRO DOMINGUEZ-AGUIRRE**, **ISMAEL SEDANO-ESCOBAR**, **BENITO CARRENO-SOTELO**, **SANTIAGO TORRES-ACOSTA**, **MARTHA SALAZAR-GARZA**, a.k.a. Pati, **LUIS ESCOBAR-ARIZMENDI**, **LAZARO AYALA-TELLEZ**, **DAXO MORALES-ROSALES**, **ELEUTERIO OTLICA-BALDERRABANO**, **OSIRIS MONTOYA-GUADARRAMA**, **GILBERTO ORTIZ- TRUJILLO**, a.k.a. Gil, a.k.a. La Maranna, a.k.a. Daniel Trujillo-Morales, **MISAEEL GOMEZ- TRUJILLO**, **MANUEL ARTURO CASTILLO**, **RAFAEL ARIZMENDI-MONTERO**, a.k.a. Jorge Landa-Lopez, a.k.a. Indictment/Notice of Penalty: **USA v. Olivares-Gonzalez et al.**

Antonio Arizmendi-Flores, **EZEQUIEL CAMPUZANO-AVILES**, a.k.a. Cheque, **MARIO GARDUNO-CASTANEDA**, a.k.a. Kanik Rodriguez-Gomez, a.k.a. Mario Godono-Casterton, a.k.a. Pulpa, **REYMUNDO MENDOZA-TREJO**, a.k.a. Manuel Ramirez- Trejo, **GALDINO TOMAS-DIONICIO**, **JOSE AVILES-ESTRADA**, a.k.a. Arturo Contreras- Lopez, a.k.a. Jose Luis Estrada, **JOSE LUIS PEDROZA-GUTIERREZ**, **JOSE JUAN PEDROZA-POPOCA**, **DOMINGO ROJAS-VILLA**, a.k.a. Mingo, **GUADALUPE GARDUNO-MONDRAGON**, a.k.a. Tito, **RAMON RODRIGUEZ**, **"ERIC" LAST NAME UNKNOWN**, **JUAN OLMOS**, **OSCAR ORTIZ**, a.k.a. Guatafay, a.k.a. Guero, **AURELIO GARDUNO-MARTINEZ**, **VICTOR MOLINA-OBANDO**, a.k.a. Victor Molina-Vuilo, **JOSE GONZALEZ-VEGA**, **ROGELIO MELCHOR-BLAS**, **MARCELO PEREZ-DOMINGUEZ**, **PEDRO DOROTEO-SOSTENES**, a.k.a. Pedro Doroteo-Sustenance, **AGUSTIN GONZALEZ-SOLANO**, **EZEQUIEL ROCCO-MONDRAGON**, a.k.a. Gato, **DAVID GARCIA-SOTELO**, a.k.a. Pedro Lopez-Hernandez, (collectively the **"DEFENDANTS"**) did conspire and agree with each other and with others known and unknown to the Grand Jury, to commit the following acts, knowing and in reckless disregard of the fact that a certain alien had come to, entered, and remained in the United States in violation of law:

1. to transport and move and attempt to transport and move said alien within the United States by means of transportation and otherwise in furtherance of such violation of law, in violation of 8 U.S.C. § 1324(a)(1)(A)(ii); and
2. to conceal, harbor and shield from detection and attempt to conceal, harbor, and shield from detection such alien in any building and any means of transportation, in violation of 8 U.S.C. § 1324(a)(1)(A)(iii).

Manner and Means of the Conspiracy

It was part of the manner and means of the conspiracy that, for financial gain, the **DEFENDANTS** together with others known and unknown to the Grand Jury, would and did agree to transport, harbor and conceal illegal aliens entering the United States unlawfully from or through Mexico. The **DEFENDANTS** are organized into approximately 14 affiliated alien smuggling organizations ("ASO's") that cooperate in arranging for illegal aliens to cross into the United States from Mexico and thereafter be transported to destinations throughout the United States. The **DEFENDANTS** coordinate and carry out the objects of the conspiracy from the Dallas, Texas, area and the Phoenix, Arizona, area. Aliens are typically smuggled from the Phoenix area to the Dallas area where they are temporarily housed until the **DEFENDANTS** arrange transportation to other destinations.

Nine affiliated ASO's are based in the Dallas area, including those operated by the following individuals:

1. **RUBEN "TEJANO" OLIVARES-GONZALES** (the "Olivares ASO");
2. **CARLOS "PELON" ESPINOZA-LAGUNAS** (the "Espinoza ASO");
3. **ALEJANDRO "CHEQUE" RODRIGUEZ-FLORES** (the "Rodriguez ASO");
4. **EUSTAQUIO "CACHO" CAMPUZANO-CANDIDO** (the "Campuzano ASO");
5. **SILVANO "TITO" TRUJILLO-GOMEZ** (the "Trujillo ASO");
6. **MISAEEL "GATO" RAMIREZ** (the "Ramirez ASO");
7. **VALENTINA CAMPUZANO-AVILES** (the "Campuzano-Aviles ASO");
8. **TOMAS GARCIA-RAMIREZ** (the "Garcia ASO"); and
9. **JOSE AVILES-ESTRADA** (the "Aviles ASO").

Five affiliated ASO's are based in the Phoenix area, including those operated by the following individuals:

1. **SERGIO "YEYO" CRUZ-FLORES** (the "Cruz ASO");
2. **MARIA "SUSANA" BLANCAS-PATINO** (the "Blancas ASO");
3. **JULIAN ORTIZ-FLORES** (the "Ortiz ASO");
4. **LEONEL "DON" CARACHURE-LOPEZ** (the "Carachure ASO"); and
5. **"ERIC" LAST NAME UNKNOWN** (the "Eric LNU ASO").

These 14 affiliated ASO's cooperate in harboring, concealing, and transporting hundreds of illegal aliens per month on average and combine resources to achieve the objects of the conspiracy, including joint use of load vehicles, drivers, and stash houses. ASO heads are aided in the oversight of these operations by load coordinators and stash house operators who house, feed, and arrange for the pickup and delivery of smuggled aliens, as well as coordinating the receipt and distribution of the proceeds generated by the unlawful enterprise.

The ASO's utilize dozens of drivers and many different load vehicles, including minivans and vehicles disguised as work vans. The **DEFENDANTS** use load vehicles that have been modified to increase the load capacity and to conceal their unlawful conduct, including the removal of seats, the tinting of windows, and the use of heavy duty shocks and/or a modified rear suspensions. Illegal aliens are regularly transported in numbers that far exceed the rated seating capacity of the load vehicle and are often directed to sit, kneel, or stand on the floor or in the cargo area of the vehicle without being provided safety restraints.

Smuggled aliens are typically charged between \$1,500 and \$2,500 to be brought into the United States and then transported to their final destination. Load coordinators, stash house operators, and drivers assist in the collection, reporting, and distribution of smuggling proceeds on behalf of the ASO heads. They also deposit collected proceeds into bank accounts or wire transfer the proceeds to designated individuals and locations as directed by the ASO heads, thereby laundering the proceeds of the alien smuggling conspiracy. The ASO heads maintain ledgers to track the flow of smuggled aliens and corresponding proceeds, as well as utilizing various bank accounts under a variety of aliases both in the United States and Mexico to receive and transmit those proceeds. Transmitted proceeds are promptly withdrawn or transferred to other accounts. Proceeds of the unlawful conduct are used to promote the conspiracy by, for example, purchasing

and servicing load vehicles and paying drivers and others involved in the process.

Overt Acts of the Conspiracy

In furtherance of the unlawful conspiracy and in order to achieve the objects thereof, the following overt acts, among others, were committed in the Eastern District of Texas and elsewhere:

1. On or about January 16, 2008, **RUBEN OLIVARES-GONZALEZ** agreed and made arrangements with others, including unindicted co-conspirator Pedro Estrada-Onofre, to transport 17 illegal aliens from the Dallas, Texas, area on behalf of the Olivares ASO.
2. On or about June 7, 2007, **CARLOS ESPINOZA-LAGUNAS** agreed and made arrangements with others, including unindicted co-conspirator Moises Inez Umana, to transport 20 illegal aliens from the Dallas, Texas, area through Hopkins County, Texas, on behalf of the Espinoza ASO.
3. On or about June 26, 2007, **ALEJANDRO RODRIGUEZ-FLORES** agreed and made arrangements with others, including co-defendant **MARTHA SALAZAR-GARZA**, to transport 17 illegal aliens from the Dallas, Texas, area on behalf of the Rodriguez ASO.
4. On or about August 2, 2007, **EUSTAQUIO CAMPUZANO-CANDIDO**, and one or more co-conspirators, including co-defendant **JORGE ALBERTO CUBAS**, coordinated the delivery and receipt of 30 illegal aliens at a Dallas, Texas, mechanic shop on behalf of the Campuzano ASO to be housed pending transportation to other locations within the United States.
5. On or about February 27, 2008, **SILVANO TRUJILLO-GOMEZ**, agreed and made arrangements with others, including unindicted co-conspirator Javier Jimenez-Jimenez, to transport 14 illegal aliens from the Dallas, Texas, area through Hopkins County, Texas, on behalf of the Trujillo ASO.

6. On or about August 9, 2008, **MISAE RAMIREZ**, agreed and made arrangements with others, including co-defendants **RUBEN OLIVARES-GONZALEZ**, **ALEJANDRO RODRIGUEZ-FLORES**, and **ELEUTERIO OTLICA-BALDERRABANO**, to transport illegal aliens from the Dallas, Texas, area on behalf of the Olivares, Rodriguez, and Ramirez ASO's.

7. On or about July 24, 2008, **VALENTINA CAMPUZANO-AVILES**, agreed and made arrangements with others, including unindicted co-conspirators Juan Prado-Alpizar and Jose Alvarez-Soto, to transport 19 illegal aliens from the Dallas, Texas, area through Hopkins County, Texas, on behalf of the Campuzano-Aviles ASO.

8. On or about August 1, 2008, **TOMASA GARCIA-RAMIREZ**, agreed and made arrangements with others, including co-defendants **ALEJANDRO RODRIGUEZ-FLORES** and **ALFONSO ECHEVERRIA-AGUIRRE**, to transport illegal aliens from the Dallas, Texas, area on behalf of the Garcia ASO.

9. In or about July 2008, **SERGIO CRUZ-FLORES**, agreed and made arrangements with others, including co-defendant **RUBEN OLIVARES-GONZALEZ**, to transport illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Cruz ASO.

10. On or about August 27, 2008, **MARIA SUSANA BLANCAS-PATINO** agreed and made arrangements with others, including co-defendants **ALEJANDRO RODRIGUEZ-FLORES** and **OSCAR ARIZMENDI-ESCOBAR**, to transport illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Blancas ASO.

11. In or about August 2008, **JULIAN ORTIZ-FLORES** agreed and made arrangements with others, including co-defendant **ALEJANDRO RODRIGUEZ-FLORES**, to transport illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the

Ortiz ASO.

12. In or about August 2008, **LEONEL CARACHURE-LOPEZ** agreed and made arrangements with others, including co-defendant **ALEJANDRO RODRIGUEZ-FLORES**, to transport illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Carachure ASO.

13. On or about June 7, 2007, **ARTURO MONTES-FLORES** agreed and made arrangements with others, including unindicted co-conspirators Alejandro Benitez Quiroz and Moises Inez Umana, to transport 20 illegal aliens from the Dallas, Texas, area through Hopkins County, Texas, on behalf of the Espinoza ASO.

14. In or about August 2008, **ALFONSO ECHEVERRIA-AGUIRRE** agreed and made arrangements with others, including co-defendant **ALEJANDRO RODRIGUEZ-FLORES**, to transport and harbor illegal aliens in the Dallas, Texas, area on behalf of the Rodriguez ASO.

15. On or about February 17, 2007, **ISRAEL MIRANDA-SEVILLA** agreed and made arrangements with others, including co-defendants **RUBEN OLIVARES-GONZALEZ** and **CARLOS ESPINOZA-LAGUNAS**, to transport a load of about 14 illegal aliens on behalf of the Olivares and Espinoza ASO's.

16. On or about October 23, 2008, **JOSE ABDENCIO TORRES-TORRES** conspired with others to transport and did in fact transport a load of about 14 illegal aliens from the Dallas, Texas, area on behalf of the Olivares ASO.

17. On or about July 12, 2008, **LOURDES BENITEZ-BAHENA** agreed and made arrangements with others, including co-defendants **RUBEN OLIVARES-GONZALEZ** and **VICTOR RAMIREZ-SANCHEZ**, to transport 8 illegal aliens on behalf of the Olivares ASO.

18. On or about June 11, 2008, **GERARDO HERNANDEZ-MEJIA** conspired with others to transport and did in fact transport 15 illegal aliens from the Dallas, Texas, area on behalf of the Trujillo ASO.

19. Or about August 2, 2007, **JORGE ALBERTO CUBAS** agreed and made arrangements with others, including co-defendant **EUSTAQUIO CAMPUZANO CANDIDO**, to coordinate the transportation and harboring of approximately 30 illegal aliens in the Dallas, Texas, area on behalf of the Campuzano ASO.

20. On or about July 28, 2008, **MARCO VERDE-ASIAIN** conspired with others to transport and did in fact transport a load of about 11 illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Rodriguez ASO.

21. On or about September 16, 2008, **BRAULIO PEREZ-DOMINGUEZ** conspired with others, including co-defendants **ALEJANDRO RODRIGUEZ-FLORES** and **GILBERTO ORTIZ-TRUJILLO**, to transport and did in fact transport a load of about 15 illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

22. On or about September 23, 2008, **FELIPE GARNICA-GARCIA** conspired with others to transport and did in fact transport a load of about 11 illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Rodriguez ASO.

23. On or about August 21, 2008, **JOSE GOMEZ-HERRERA** conspired with others to transport and did in fact transport a load of about 15 illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

24. On or about July 12, 2008, **VICTOR MANUEL RAMIREZ-SANCHEZ** conspired with others, including co-defendants **RUBEN OLIVARES-GONZALEZ**,
ALEJANDRO RODRIGUEZ-FLORES, **SILVANO TRUJILLO-GOMEZ**, and **LOURDES**

BENITEZ-BAHENA, to transport and did in fact transport a load of about 20 illegal aliens from the Dallas, Texas, area on behalf of the Olivares, Rodriguez, and Trujillo ASO's.

25. On or about August 27, 2008, **OSCAR ARIZMENDI-ESCOBAR** conspired with others, including co-defendants **ALEJANDRO RODRIGUEZ-FLORES** and **MARIA SUSANA BLANCAS-PATINO**, to transport and did in fact transport a load of about 18 illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez and Blancas ASO's.

26. On or about April 23, 2008, **CELIO TORRES-LINARES** conspired with others to transport and did in fact transport a load of about 17 illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Rodriguez ASO.

27. On or about December 8, 2008, **IRINEO ARIZMENDI-ARIZMENDI** conspired with others to transport and did in fact transport a load of about 17 illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

28. On or about March 23, 2006, **VICTOR JUAN ESQUIVEL-GOMEZ** conspired with others to transport and did in fact transport a load of about 16 illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Rodriguez ASO.

29. On or about July 16, 2008, **VICTOR SALAMANCA-CERVANTES** conspired with others to transport about three illegal aliens from the Dallas, Texas, area on behalf of the Campuzano ASO.

30. On or about August 3, 2008, **LUIS SOTELO-DOMINGUEZ** conspired with others to transport and did in fact transport a load of about 12 illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Rodriguez ASO.

31. On or about August 7, 2008, **PEDRO DOMINGUEZ-AGUIRRE** conspired with others to transport and did in fact transport a load of about 13 illegal aliens from the Dallas,

Texas, area on behalf of the Rodriguez ASO.

32. On or about August 15, 2008, **ISMAEL SEDANO-ESCOBAR** conspired with others to transport and did in fact transport a load of about 21 illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

33. On or about September 10, 2007, **BENITO CARRENO-SOTELO** conspired with others to transport and did in fact transport a load of about 20 illegal aliens from the Dallas, Texas, area on behalf of the Rodriguez ASO.

34. On or about April 8, 2008, **SANTIAGO TORRES-ACOSTA** conspired with others to transport and did in fact transport a load of about 17 illegal aliens from the Phoenix, Arizona, area to the Dallas, Texas, area on behalf of the Rodriguez ASO.

35. On or about June 26, 2007, **MARTHA SALAZAR-GARZA** conspired with others, including co-defendant **ALEJANDRO RODRIGUEZ-FLORES**, to transport and did in fact transport about 17 illegal aliens from the Dallas, Texas, area on behalf of the Rodriguez ASO.

36. On or about March 17, 2008, **LUIS ESCOBAR-ARIZMENDI** conspired with others, including co-defendant **LAZARO AYALA-TELLEZ**, to transport and did in fact transport a load of about 18 illegal aliens from the Dallas, Texas, area on behalf of the Olivares ASO.

37. On or about March 17, 2008, **LAZARO AYALA-TELLEZ** conspired with others, including co-defendant **LUIS ESCOBAR-ARIZMENDI**, to transport and did in fact transport a load of about 18 illegal aliens from the Dallas, Texas, area on behalf of the Olivares ASO.

38. On or about January 21, 2008, **DAXO MORALES-ROSALES** conspired with others to transport and did in fact transport a load of about 19 illegal aliens from the Dallas,

Texas, area on behalf of the Campuzano ASO.

39. On or about August 9, 2008, **ELEUTERIO OTLICA-BALDERRABANO** conspired with others, including co-defendant **MISAEEL RAMIREZ**, to transport and did in fact transport illegal aliens from the Dallas, Texas, area on behalf of the Olivares and Rodriguez ASO's.

40. On or about February 27, 2008, **OSIRIS MONTOYA-GUADARRAMA** conspired with others, including co-defendant **SILVANO TRUJILLO-GOMEZ**, to transport and did in fact transport about 14 illegal aliens from the Phoenix, Arizona, area on behalf of the Trujillo ASO.

41. On or about February 11, 2008, **GILBERTO ORTIZ-TRUJILLO** conspired with others to transport and did in fact transport a load of about 14 illegal aliens from the Phoenix, Arizona area on behalf of the Rodriguez ASO.

42. On or about October 3, 2008, **MISAEEL GOMEZ-TRUJILLO** conspired with others to transport and did in fact transport a load of about 10 illegal aliens from the Phoenix, Arizona, area on behalf of the Trujillo ASO.

43. On or about May 22, 2007, **MANUEL ARTURO CASTILLO** conspired with others to transport and did in fact transport a load of about 4 illegal aliens from the El Paso, Texas, area on behalf of the Espinoza ASO.

44. On or about January 21, 2008, **RAFAEL ARIZMENDI-MONTERO** conspired with others to transport and did in fact transport a load of about 14 illegal aliens from the Phoenix, Arizona, area on behalf of the Espinoza ASO.

45. Between in or about July 2008, through in or about August 2008, **EZEQUIEL CAMPUZANO-AVILES** agreed and made arrangements with others, including co-defendant

RUBEN OLIVARES GONZALEZ, to transport illegal aliens to and from various locations within the United States on behalf of the Olivares and Campuzano-Aviles ASO's.

46. On or about August 23, 2008, **MARIO GARDUNO-CASTANEDA** coordinated with others, including co-defendant **ALEJANDRO RODRIGUEZ-FLORES**, to ensure proper handling of the proceeds from the transportation of a load of about illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

47. On or about July 24, 2008, **REYMUNDO MENDOZA TREJO** conspired with others to transport and did in fact transport a load of about 15 illegal aliens from the Phoenix, Arizona, area on behalf of the Trujillo ASO.

48. On or about November 25, 2008, **GALDINO TOMAS-DIONICIO** conspired with others to transport and did in fact transport a load of about 11 illegal aliens from the Phoenix, Arizona, area on behalf of the Campuzano ASO.

49. On or about July 23, 2008, **JOSE AVILES-ESTRADA** agreed with and made arrangements with others, including co-defendants **RUBEN OLIVARES-GONZALEZ** and **ALEJANDRO RODRIGUEZ-FLORES**, to transport illegal aliens from the Phoenix, Arizona, area on behalf of the Aviles ASO.

50. On or about December 2, 2008, **JOSE LUIS PEDROZA-GUTIERREZ** conspired with others to transport and did in fact transport a load of about 10 illegal aliens from the Phoenix, Arizona, area on behalf of the Campuzano ASO.

51. On or about February 3, 2009, **JOSE JUAN PEDROZA-POPOCA** conspired with others to transport and did in fact transport a load of about 12 illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez and Campuzano ASO's.

52. Between in or about July 2008, through in or about August 2008, **DOMINGO**

ROJAS-VILLA agreed and made arrangements with others, including co-defendants **RUBEN OLIVARES-GONZALEZ** and **ALEJANDRO RODRIGUEZ-FLORES**, to transport illegal aliens from the Phoenix, Arizona, area on behalf of the Olivares and Rodriguez ASO's.

53. Between in or about July 2008, through in or about August 2008, **GUADALUPE GARDUNO-MONDRAGON** agreed with and made arrangements with others, including co-defendant **ALEJANDRO RODRIGUEZ-FLORES**, to transport loads of illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

54. Between in or about July 2008, through in or about August 2008, **RAMON RODRIGUEZ** agreed with and made arrangements with others, including co-defendant **RUBEN OLIVARES-GONZALEZ**, to transport loads of illegal aliens from the Phoenix, Arizona, area on behalf of the Olivares ASO.

55. Between in or about July 2008, through in or about August 2008, **"ERIC" LAST NAME UNKNOWN** agreed with and made arrangements with others, including co-defendant **RUBEN OLIVARES-GONZALEZ**, to transport loads of illegal aliens from the Phoenix, Arizona, area on behalf of the Eric LNU ASO.

56. In or about August 2008, **JUAN OLMOS** agreed with and made arrangements with others, including co-defendant **ALEJANDRO RODRIGUEZ-FLORES**, to transport loads of illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

57. In or about August 2008, **OSCAR ORTIZ** agreed with and made arrangements with others, including co-defendant **ALEJANDRO RODRIGUEZ-FLORES**, to transport loads of illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

58. On or about February 26, 2008, **AURELIO GARDUNO-MARTINEZ** conspired with others, including co-defendant **JOSE GONZALEZ-VEGA**, to transport and did in fact

transport a load of about 18 illegal aliens from the Phoenix, Arizona, area on behalf of the Campuzano ASO.

59. On or about June 6, 2008, **VICTOR MOLINA-OBANDO** conspired with others, including co-defendant **ROGELIO MELCHOR-BLAS**, to transport and did in fact transport a load of about 17 illegal aliens from the Dallas, Texas, area on behalf of the Campuzano ASO.

60. On or about February 26, 2008, **JOSE GONZALEZ-VEGA** conspired with others, including co-defendant **AURELIO GARDUNO-MARTINEZ**, to transport and did in fact transport a load of about 18 illegal aliens from the Phoenix, Arizona, area on behalf of the Campuzano ASO.

61. On or about June 6, 2008, **ROGELIO MELCHOR-BLAS** conspired with others, including co-defendant **VICTOR MOLINA-OBANDO**, to transport and did in fact transport a load of about 17 illegal aliens from the Dallas, Texas, area on behalf of the Campuzano ASO.

62. On or about June 23, 2008, **MARCELO PEREZ-DOMINGUEZ** conspired with others to transport and did in fact transport a load of about 16 illegal aliens from the Phoenix, Arizona, area on behalf of the Rodriguez ASO.

63. On or about March 11, 2009, **PEDRO DOROTEO-SOSTENES** conspired with others to transport and did in fact transport a load of about 12 illegal aliens from the Dallas, Texas, area on behalf of the Campuzano ASO.

64. On or about June 17, 2008, **AGUSTIN GONZALEZ-SOLANO** conspired with others to transport and did in fact transport a load of about 21 illegal aliens from the Dallas, Texas, area on behalf of the Campuzano-Aviles ASO.

65. On or about March 9, 2009, **EZEQUIEL ROCCO-MONDRAGON** conspired with others to transport and did in fact transport a load of about 13 illegal aliens from the Dallas,

Texas, area on behalf of the Campuzano-Aviles ASO.

66. On or about May 9, 2008, **DAVID GARCIA-SOTELO** conspired with others to transport and did in fact transport a load of about 16 illegal aliens from the Phoenix, Arizona, area on behalf of the Trujillo ASO.

All in violation of 8 U.S.C. § 1324(a)(1)(A)(v)(I).

COUNT TWO

Violation: 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering)

The Grand Jury hereby adopts, re-alleges, and incorporates by reference, as if fully set forth herein, all of the allegations contained in Count One of the Indictment.

From in or about 2006, the exact date unknown, and continuously thereafter up to and including the date of the filing of this Indictment, in Hopkins County, Texas, in the Eastern District of Texas, and elsewhere, Defendants,

- (1) **RUBEN OLIVARES-GONZALEZ**,
a.k.a. Tejano,
- (3) **ALEJANDRO RODRIGUEZ-FLORES**,
a.k.a. Cheque, a.k.a. Ezequiel Trujillo,
- (5) **SILVANO TRUJILLO-GOMEZ**,
a.k.a. Tito, a.k.a. Xavier Escobar-Perez, a.k.a. Roberto Espinoza-Arizmendi,
- (7) **VALENTINA CAMPUZANO-AVILES**,
a.k.a. Dalia Bautista, a.k.a. Valenta,
- (12) **LEONEL CARACHURE- LOPEZ**,
a.k.a. Don,
- (14) **ALFONSO ECHEVERRIA-AGUIRRE**,
a.k.a. Don Poncho,
- (15) **ISRAEL MIRANDA-SEVILLA**,
a.k.a. Pirras,
- (17) **LOURDES BENITEZ-BAHENA**,
a.k.a. Lulu,
- (20) **MARCO VERDE-ASIAIN**,
- (21) **BRAULIO PEREZ-DOMINGUEZ**,
- (27) **IRINEO ARIZMENDI-ARIZMENDI**,
- (35) **MARTHA SALAZAR-GARZA**,

a.k.a. Pati,
(45) EZEQUIEL CAMPUZANO-AVILES,
a.k.a. Cheque,
(46) MARIO GARDUNO-CASTANEDA,
a.k.a. Pulpa, a.k.a. Kanik Rodriguez-Gomez, a.k.a. Mario Godono-Casterton,
(54) RAMON RODRIGUEZ, and
(55) "ERIC" LAST NAME UNKNOWN,

did knowingly and willfully conspire, combine, and agree together and with others known and unknown to the Grand Jury, to commit certain offenses under Title 18, United States Code, Section 1956, that is, to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, Conspiracy to Transport and Harbor Illegal Aliens, with the intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

Manner and Means of the Conspiracy

It was part of the conspiracy that the Defendants, together with others known and unknown to the Grand Jury, would and did harbor, conceal, and transport illegal aliens for financial gain and conspired to do so in a manner as set out in the preceding paragraphs of this Indictment. It was an object of the conspiracy to obtain large amounts of United States currency in exchange for harboring, concealing, and transporting illegal aliens.

As part of the conspiracy, the defendants would and did require illegal aliens to pay money for passage into and within the United States, and to be harbored and concealed during the process of being smuggled to their desired destination. Proceeds generated by the unlawful conduct would then be deposited into designated accounts at various financial institutions, moved by wire

transfer, and otherwise distributed according to the directions of ASO heads and other conspirators. The illegal proceeds would thereafter be drawn from the designated bank accounts and otherwise received and distributed to each of the defendants based on a previously agreed arrangement.

All in violation of 18 U.S.C. § 1956(h).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
Pursuant to 8 U.S.C. § 1324, 18 U.S.C. §§ 981-982; 21 U.S.C. §§ 853; and 28 U.S.C. § 2461

As the result of committing the foregoing offenses as alleged in this Indictment, Defendants shall forfeit to the United States (1) all property that constitutes or is derived from proceeds obtained directly or indirectly from the commission of the offenses, 18 U.S.C. § 982(a)(1), and (2) any conveyance, including any vessel, vehicle, or aircraft, that has been or is being used in the commission of the offense, the gross proceeds of such offense, and any property traceable to such conveyance or proceeds, 8 U.S.C. § 1324(b)(1). The property to be forfeited includes, but is not limited to, the following:

Real Property

A residence located at 109 Jeffery Road, Palmer, Texas, and described as Lot 4, Rockett Estates, an Addition in Ellis County, Texas, according to the Map thereof recorded in Cabinet B, Slide 28, Plat Records, Ellis County, Texas.

A residence located at 11039 Wallbrook Dr., Dallas, Texas, and described as Lot 10, Block 10A/7486, in the replat of all of Kingsley Meadows, an Addition to the City of Dallas, Dallas County, Texas, according to the plat thereof recorded in volume 74075, page 2177, map records, Dallas County, Texas.

Cash Proceeds

Approximately \$3,600,000 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the foregoing offenses alleged in this Indictment.

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of Defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by Defendants.

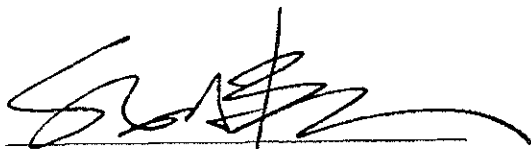
By virtue of the commission of the violations alleged in this Indictment, any and all interest that Defendants have in the above-described property is vested in the United States and hereby forfeited to the United States.

A TRUE BILL,



FOREPERSON OF THE GRAND JURY

REBECCA A. GREGORY
UNITED STATES ATTORNEY



STEVAN A. BUYS
Assistant United States Attorney

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA	§	FILED UNDER SEAL
	§	
VS.	§	CASE NO. 4:08-CR-__
	§	Judge Crone
(1) RUBEN OLIVARES-GONZALEZ,	§	
a.k.a. Tejano,	§	
(2) CARLOS ESPINOZA-LAGUNAS,	§	
a.k.a. Pelon,	§	
(3) ALEJANDRO RODRIGUEZ-FLORES,	§	NOTICE OF PENALTY
a.k.a. Cheque,	§	
a.k.a. Ezequiel Trujillo,	§	
(4) EUSTAQUIO CAMPUZANO-CANDIDO,	§	
a.k.a. Cacho,	§	
a.k.a. Eustaquio Campuzano-Figueroa,	§	
(5) SILVANO TRUJILLO-GOMEZ,	§	
a.k.a. Tito,	§	
a.k.a. Xavier Escobar-Perez,	§	
a.k.a. Roberto Espinoza-Arizmendi,	§	
(6) MISAEL RAMIREZ,	§	
a.k.a. Gato,	§	
(7) VALENTINA CAMPUZANO-AVILES,	§	
a.k.a. Dalia Bautista,	§	
a.k.a. Valenta,	§	
(8) TOMASA GARCIA-RAMIREZ,	§	
(9) SERGIO CRUZ-FLORES,	§	
a.k.a. Yeyo,	§	
(10) MARIA SUSANA BLANCAS-PATINO,	§	
(11) JULIAN ORTIZ-FLORES,	§	
(12) LEONEL CARACHURE-LOPEZ,	§	
a.k.a. Don,	§	
(13) ARTURO MONTES-FLORES,	§	
a.k.a. Don Arturo,	§	
(14) ALFONSO ECHEVERRIA-AGUIRRE,	§	
a.k.a. Don Poncho,	§	
(15) ISRAEL MIRANDA-SEVILLA,	§	
a.k.a. Pirras,	§	
(16) JOSE ABDENCIO TORRES-TORRES,	§	
(17) LOURDES BENITEZ-BAHENA,	§	
a.k.a. Lulu,	§	

- (18) GERARDO HERNANDEZ-MEJIA, §
a.k.a. Carlitos, §
- (19) JORGE ALBERTO CUBAS, §
- (20) MARCO VERDE-ASIAIN, §
- (21) BRAULIO PEREZ-DOMINGUEZ, §
- (22) FELIPE GARNICA-GARCIA, §
- (23) JOSE GOMEZ-HERRERA, §
a.k.a. Nestor Arizmendi-Escobar, §
- (24) VICTOR MANUEL RAMIREZ-SANCHEZ, §
a.k.a. Don Victor, §
- (25) OSCAR ARIZMENDI-ESCOBAR, §
- (26) CELIO TORRES-LINARES, §
- (27) IRINEO ARIZMENDI-ARIZMENDI, §
- (28) VICTOR JUAN ESQUIVEL-GOMEZ, §
a.k.a. Christian Herrera-zuares, §
- (29) VICTOR SALAMANCA-CERVANTES, §
- (30) LUIS SOTELO-DOMINGUEZ, §
- (31) PEDRO DOMINGUEZ-AGUIRRE, §
- (32) ISMAEL SEDANO-ESCOBAR, §
- (33) BENITO CARRENO-SOTELO, §
- (34) SANTIAGO TORRES-ACOSTA, §
- (35) MARTHA SALAZAR-GARZA, §
a.k.a. Pati, §
- (36) LUIS ESCOBAR-ARIZMENDI, §
- (37) LAZARO AYALA-TELLEZ, §
- (38) DAXO MORALES-ROSALES, §
- (39) ELEUTERIO OTLICA-BALDERRABANO, §
- (40) OSIRIS MONTOKA-GUADARRAMA, §
- (41) GILBERTO ORTIZ-TRUJILLO, §
a.k.a. Gil, §
a.k.a. La Maranna, §
a.k.a. Daniel Trujillo-Morales, §
- (42) MISAEL GOMEZ-TRUJILLO, §
- (43) MANUEL ARTURO CASTILLO, §
- (44) RAFAEL ARIZMENDI-MONTERO, §
a.k.a. Jorge Landa-Lopez, §
a.k.a. Antonio Arizmendi-Flores, §
- (45) EZEQUIEL CAMPUZANO-AVILES, §
a.k.a. Cheque, §
- (46) MARIO GARDUNO-CASTANEDA, §
a.k.a. Pulpa, §
a.k.a. Kanik Rodriguez-Gomez, §
a.k.a. Mario Godono-Casterton, §
- (47) REYMUNDO MENDOZA-TREJO, §
a.k.a. Manuel Ramirez-Trejo, §

(48) GALDINO TOMAS-DIONICIO,	§
(49) JOSE AVILES-ESTRADA,	§
a.k.a. Arturo Contreras-Lopez,	§
a.k.a. Jose Luis Estrada,	§
(50) JOSE LUIS PEDROZA-GUTIERREZ,	§
(51) JOSE JUAN PEDROZA-POPOCA,	§
(52) DOMINGO ROJAS-VILLA,	§
a.k.a. Mingo,	§
(53) GUADALUPE GARDUNO-MONDRAGON	§
a.k.a. Tito,	§
(54) RAMON RODRIGUEZ,	§
(55) "ERIC" LAST NAME UNKNOWN,	§
(56) JUAN OLMOS,	§
(57) OSCAR ORTIZ,	§
a.k.a. Guatafay,	§
a.k.a. Guero,	§
(58) AURELIO GARDUNO-MARTINEZ,	§
(59) VICTOR MOLINA-OBANDO,	§
a.k.a. Victor Molina-Vuילו,	§
(60) JOSE GONZALEZ-VEGA,	§
(61) ROGELIO MELCHOR-BLAS,	§
(62) MARCELO PEREZ-DOMINGUEZ,	§
(63) PEDRO DOROTEO-SOSTENES,	§
a.k.a. Pedro Doroteo-Sustanance,	§
(64) AGUSTIN GONZALEZ-SOLANO,	§
(65) EZEQUIEL ROCCO-MONDRAGON,	§
a.k.a. Gato,	§
(66) DAVID GARCIA-SOTELO,	§
a.k.a. Pedro Lopez-Hernandez,	§
Defendants	§

NOTICE OF PENALTY

COUNT ONE

Violation: 8 U.S.C. § 1324(a)(1)(A)(v)(I) (Conspiracy to Transport and Harbor Illegal Aliens)

Penalty: Not more than ten (10) years imprisonment, a fine not to exceed \$250,000, and supervised release of not more than three (3) years.

Special Assessment: \$100.00

COUNT TWO

Violation: 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering)

Penalty: A term of imprisonment of not more than twenty (20) years, a fine not to exceed \$500,000 or twice the value of the property involved in the transaction, whichever is greater, and supervised release of not more than three (3) years.

Special Assessment: \$100.00